

EXHIBIT D

Lopez, Lidia
L.C., a minor v. State of California

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through her
guardian ad litem Maria Cadena,
individually and as
successor-in-interest to Hector Puga;
I.H., a minor by and through his
guardian ad litem Jasmine Hernandez,
individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian ad litem Lydia Lopez,
individually and as
successor-in-interest to Hector Puga;
and ANTONIA SALAS UBALDO,
individually,

CASE NO.
5:22-cv-00949
-KK-(SHKx)

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF
SAN BERNARDINO; S.S.C., a nominal
defendant; ISAIAH KEE;
MICHAEL BLACKWOOD; BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 6-10, inclusive,

Defendants.

VIDEOTAPED

ZOOM DEPOSITION OF LIDIA LOPEZ
WEDNESDAY, DECEMBER 4, 2024

2:05 P.M.

REPORTED BY: VICTORIA FRENCH, CSR NO. 14193

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1 A P P E A R A N C E S

2

3 FOR THE PLAINTIFFS:

4 LAW OFFICES OF DALE K. GALIPO
BY: HANG LE, ESQ.
5 21800 Burbank Boulevard, Suite 310
Woodland Hills, California 91367
6 t. 818.347.3333
e. hlee@galipolaw.com

7

8 FOR THE DEFENDANTS COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, AND JAKE ADAMS:

9

10 LYNBERG & WATKINS
BY: SHANNON GUSTAFSON, ESQ.
11 1100 West Town & Country Road, Suite #1450
Orange, California 92868
t. 714.937.1010
12 e. sgustafson@lynberg.com

13

14 FOR THE DEFENDANTS STATE OF CALIFORNIA, BY AND
THROUGH CALIFORNIA HIGHWAY PATROL AND MICHAEL
BLACKWOOD:

15

16 TORT & CONDEMNATION SECTION
OFFICE OF THE ATTORNEY GENERAL
BY: DIANA ESQUIVEL, DEPUTY ATTORNEY GENERAL
17 1300 I Street, Suite 125
Sacramento, California 95814
t. 916.210.7320
18 e. diana.esquivel@doj.ca.gov

19

20

21 ALSO PRESENT:

22 -BLAKE JONES, Legal Videographer

23

24

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I N D E X

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3 WITNESS: LIDIA LOPEZ

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1 WEDNESDAY, DECEMBER 4, 2024, 2:05 P.M.
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3

4 THE VIDEOGRAPHER: Good afternoon. This
5 is the video deposition of Lidia Lopez, taken
6 remotely on Wednesday, December 4th, 2024, in the
7 matter of L.C. et al. versus State of California,
8 County of San Bernardino, Case Number
9 5:22-cv-00949-KK-(SHKx). This case is being heard
10 in the United States District Court in the Central
District of California.

11 My name of Blake Jones, legal
12 videographer, contracted through Dean Jones Legal
13 Videos, Incorporated, Los Angeles and Santa Ana,
14 California. Since we're not in person today, the
15 videographer might have to interrupt the proceedings
16 if the deponent drifts out of frame or we have any
17 connectivity issues. This deposition is commencing
18 at 2:05 p.m.

19 Would all present please identify
20 themselves, beginning with the deponent?

21 THE WITNESS: Lidia Lopez.

22 MS. GUSTAFSON: Shannon Gustafson for the
23 San Bernardino County Defendants.

24 MS. ESQUIVEL: Diana Esquivel on behalf of
25 the State of California, Officer -- California

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1 Highway Patrol Officers Kee, Blackwood, and
2 Rubalcava, appearing from Sacramento.

3 MS. LE: Hang Le on behalf of the deponent
4 Lidia Lopez and the Plaintiffs.

5 THE VIDEOGRAPHER: Court reporter, please
6 administer the oath.

7 - - -

8 LIDIA LOPEZ,

9 having first declared under penalty of
10 perjury to tell the truth, was examined
11 and testified as follows:

12 -EXAMINATION-

13 BY MS. GUSTAFSON:

02:06:01 14 Q. Will you please state and spell your full
02:06:03 15 name for the record?

02:06:04 16 A. Yes. Lidia Lopez, L-i-d-i-a, L-o-p-e-z.

02:06:15 17 Q. Have you ever gone by any other name other
02:06:17 18 than Lidia Lopez?

02:06:18 19 A. No.

02:06:19 20 Q. Have you ever had your deposition taken
02:06:19 21 before?

02:06:20 22 A. No.

02:06:21 23 Q. Since this is a new process to you, I'm
02:06:23 24 just going to go ahead and explain some of the
02:06:27 25 ground rules. I'm sure you had an opportunity to

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03:13:00 1 gone?

03:13:02 2 Q. The last time you talked to her.

03:13:04 3 A. She called Allyson this morning.

03:13:10 4 Q. Does she regularly call Allyson?

03:13:13 5 A. She calls her in the nighttime, or Allyson

03:13:15 6 will call her when I'm free for her to talk to her.

03:13:21 7 Q. When was the last time that Allyson saw

03:13:26 8 Antonia?

03:13:27 9 A. She came for her 3rd birthday party.

03:13:33 10 Q. Do you know where Antonia currently lives?

03:13:37 11 A. Yeah. In Long Beach.

03:13:43 12 Q. How far is Long Beach from Bell?

03:13:51 13 A. About maybe 20 to 25 minutes.

03:13:59 14 Q. You had told me earlier that you were no

03:14:02 15 longer in a relationship with Hector in February of

03:14:06 16 2021.

03:14:08 17 What was the reason your relationship with

03:14:10 18 him ended while you were still pregnant with

03:14:13 19 Allyson?

03:14:19 20 A. It's kind of, like, I'm a stay-at-home

03:14:26 21 person, and, you know, he liked to be outdoors a

03:14:30 22 lot, and it's just we were not compatible.

03:14:41 23 Q. Were you aware that Hector had been

03:14:42 24 arrested before he was in a relationship with you?

03:14:47 25 A. Not that I recall.

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03:14:48 1 Q. Did he ever tell you that he had been
03:14:50 2 arrested?
03:14:54 3 A. Yeah, but I don't know why.
03:14:57 4 Q. Did you ever ask him why he had been
03:14:59 5 arrested in the past?
03:15:01 6 A. No.
03:15:03 7 Q. Were you concerned at all that he had been
03:15:05 8 arrested previously?
03:15:07 9 A. No.
03:15:08 10 Q. Why not?
03:15:12 11 A. I just didn't think of asking him why. I
03:15:17 12 mean, he was out, and that's all I cared for.
03:15:23 13 Q. Were you aware that he had been in jail in
03:15:26 14 prison?
03:15:28 15 A. Not that I recall.
03:15:31 16 Q. Did Hector ever tell you that he had spent
03:15:33 17 time in prison?
03:15:34 18 A. No.
03:15:35 19 Q. Is me asking the question the first time
03:15:45 20 you learned that he had previously been to prison?
03:15:48 21 A. I mean, I've heard it around, but that's
03:15:51 22 as much as I know about it.
03:15:53 23 Q. And what do you mean you heard it around?
03:15:55 24 A. I mean, people talk, Facebook. I mean,
03:15:58 25 there's internet.

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1 I, Victoria French, CSR No. 14193, certify:
2 that the foregoing proceedings were taken before me
3 at the time and place herein set forth; at which
4 time the witness was duly sworn; and that the
5 transcript is a true record of the testimony so
6 given.

7 Witness review, correction and signature was
8 (X) by Code. () requested.
9 () waived. () not requested.
10 () not handled by the deposition officer due to
11 party stipulation.

12 The dismantling, unsealing, or unbinding of
13 the original transcript will render the reporter's
14 certificate null and void.

15 I further certify that I am not financially
16 interested in the action, and I am not a relative or
17 employee of any attorney of the parties, nor of any
18 of the parties.

19
20 Dated this 14th day of January, 2025
21
22



23
24 _____
25 Victoria French